

**LEE TRAN & LIANG APLC**

Enoch H. Liang (SBN 212324)  
[enoch.liang@ltlattorneys.com](mailto:enoch.liang@ltlattorneys.com)  
James M. Lee (SBN 192301)  
[james.lee@ltlattorneys.com](mailto:james.lee@ltlattorneys.com)  
Lisa Chin (SBN 259793)  
[lisa.chin@ltlattorneys.com](mailto:lisa.chin@ltlattorneys.com)  
702 Marshall Street, Suite 411  
Redwood City, California  
Telephone: (650) 241-2140  
Facsimile: (213) 612-3773

Attorneys for Plaintiff  
Easton-Bell Sports, Inc.

**KILPATRICK TOWNSEND & STOCKTON LLP**

Gregory S. Gilchrist (SBN 111536)  
[ggilchrist@kilpatricktownsend.com](mailto:ggilchrist@kilpatricktownsend.com)  
Two Embarcadero Center, Eighth Floor  
San Francisco, CA 94111  
Telephone: 415-576-0200  
Facsimile: 415-576-0300

William Brewster (*pro hac vice*)  
[bbrewster@kilpatricktownsend.com](mailto:bbrewster@kilpatricktownsend.com)  
Jessica A. Pratt (*pro hac vice*)  
[japratt@kilpatricktownsend.com](mailto:japratt@kilpatricktownsend.com)  
1100 Peachtree Street NE, Suite 2800  
Atlanta, GA 30309  
Telephone: 404-815-6500  
Facsimile: 404-815-6555

Attorneys for Defendant  
E.I. de Pont de Nemours and Company

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

EASTON-BELL SPORTS, INC. a Delaware  
corporation,

Plaintiff,

v.

E. I. DU PONT DE NEMOURS AND  
COMPANY, a Delaware corporation, aka  
DUPONT, and DOES 1 through 10,

Case No.: 3:13-cv-00283-NC

**STIPULATED REQUEST TO CONTINUE  
THE DEADLINE FOR COMPLETING  
ADR AND TO AMEND SCHEDULING  
ORDER WITH ~~PROPOSED~~ ORDER**

Magistrate Judge Nathanael M. Cousins

Defendants.

E.I. DU PONT DE NEMOURS AND  
COMPANY, a Delaware corporation,

Counterclaim-Plaintiff,

v.

EASTON-BELL SPORTS, INC a Delaware  
corporation,

Counterclaim-Defendant.

Pursuant to Local Rule 6-2, this Stipulated Request is entered into by and between Plaintiff/Counterclaim-Defendant Easton-Bell Sports, Inc. ("Easton-Bell"), and Defendant/Counterclaim-Plaintiff E.I. du Pont de Nemours and Company ("DuPont") by and through their respective counsel.

1. The parties have met and conferred and propose (a) an extension of the deadline to complete the Alternative Dispute Resolution process of Early Neutral Evaluation and (b) amendment to the Case Management Scheduling Order as set forth below.

2. The deadline for completing the Alternative Dispute Resolution process of Early Neutral Evaluation currently is set for August 5, 2013, as requested by the parties (Dkt. No. 37).

3. The Court entered the Case Management Scheduling Order on May 1, 2013 (Dkt. No. 33).

4. The parties have met and conferred and propose (a) continuing the deadline for completing Alternative Dispute Resolution to August 26, 2013 and (b) amending the Case Management Scheduling Order as follows:

Item	Original Deadline in Case Management Report (Dkt. No. 33)	Amended Deadline
Completion of Non-Expert Discovery	September 6, 2013	October 30, 2013
Plaintiff's disclosure of expert witness opinions	September 27, 2013	November 20, 2013
Defendant's disclosure of expert testimony and reports	October 28, 2013	December 20, 2013
Close of expert discovery	November 27, 2013	January 15, 2014

5. The parties believe good cause exists for these amendments because they have made significant progress in working toward a potential negotiated settlement, and anticipate that they will be in a position to execute an agreement prior to August 26, 2013. The parties' proposed deadlines will not affect the Court's dispositive motion hearing deadline, which will remain as previously set (February 5, 2014).

1 WHEREFORE, the parties respectfully request that the Court enter an Order adopting the  
2 deadlines suggested herein.

3  
4 Respectfully Submitted,  
5 DATED: August 5, 2013 LEE TRAN & LIANG APLC

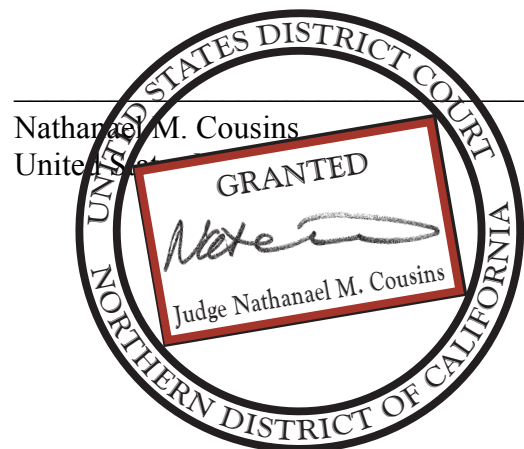
6 /s/ Enoch H. Liang  
7 Enoch H. Liang  
8 Attorney for Plaintiff Easton-Bell Sports, Inc.

9 DATED: August 5, 2013 KILPATRICK TOWNSEND & STOCKTON LLP

10 /s/ Jessica A. Pratt  
11 Jessica A. Pratt  
12 Attorney for Defendant E.I. du Pont de Nemours and  
13 Company

14  
15  
16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17  
18 DATED: August 6, 2013



ECF ATTESTATION

I, Jessica A. Pratt, am the ECF user whose identification and password are being used to file the parties' Joint Motion to Continue Deadline for Completing ADR and to Amend Scheduling Order with [PROPOSED] Order. In compliance with Civil Rule 5.1, I hereby attest that concurrence in the filing of this document has been obtained from Lisa Chin. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of August 2013.

/s/ Jessica A. Pratt

Jessica A. Pratt

Attorney for Defendant/Counterclaim-Plaintiff